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March 21, 2001

National Highway Traffic
Safety Administration
Docket Management
Room PL-401
400 Seventh Street, SW
Washington, DC 20590

Docket No. NHTSA 2001-8677; Notice 1 RIN 2127-A125 — 51

Dear Sir or Madam:

In the Federal Register of January 22, 2001 the National Highway Traffic Safety Administration (NHTSA) published an Advanced Notice of Proposed Rulemaking (ANPR) requesting comments on ways in which NHTSA could implement the "early warning requirements" of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act.

Shepherd Hardware Products, LLC sells felt pads which are supplied to the automotive industry. Their use has no impact on vehicle safety or operation.

Shepherd supports policies which will enhance the safety of the public, improve NHTSA's and the automotive industry's ability to recognize potential safety problems early and, specifically, the objectives of the TREAD Act. The policy choices discussed in the ANPR are varied and the ultimate selection from among the choices will have significant impact on NHTSA and the automotive industry. Shepherd believes that an effective policy is to limit the scope of the regulation to components and equipment which may support vehicle safety. As noted in the ANPR, the regulation could conceivably cover all part and component/suppliers including those whose products pose no safety concerns.

Shepherd believes that focusing on components which have an impact on automotive safety will utilize NHTSA's and industry's resources efficiently and effectively.

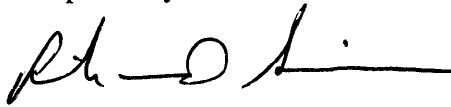
If appropriate limits are not established, the purposes of the TREAD Act could be adversely affected by overwhelming the reporting and documenting systems with information not relevant to automotive safety. This would interfere with identification of true safety-related problems.

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Failure to exclude equipment and components which could have no impact on safety would require NHTSA to review and maintain in its systems information which serves no objective encompassed by the TREAD Act.

Shepherd appreciates this opportunity to comment on NHTSA's implementation of the TREAD Act and to provide its views.

Respectfully,

A handwritten signature in black ink, appearing to read 'Richard Simon', with a stylized flourish at the end.

Richard Simon
Controller